

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANY, <i>et. al.</i>	:	09-50026 (REG)
<i>f/k/a General Motors Corp., et. al.</i>	:	
	:	
Debtors	:	(Jointly Administered)
	:	
<hr/>		X

**RESPONSE TO OBJECTION TO CLAIM**

TAKE NOTICE that the Debtor Foster Townsend Graham & Associates LLP, Claim number 38931 as listed in Exhibit "A" of the Notice of 220<sup>TH</sup> Omnibus Objection to Claims objects to the expungement of its claim on the basis that the Statement of Claim was issued on August 9, 2007, the Statement of Defence served and dated June 25, 2008 and the case has not yet been settled or tried. To date, no judgment has been rendered.

The amount of the claim as of the date the case was filed on June 1, 2009, is \$5 million dollars. The basis for the claim is a Crossclaim in relation to the legal action for personal injury and enclosed herewith is a copy of the Statement of Defence and Crossclaim (attached as Exhibit "A").

The Plaintiff in a civil matter (court file number 4768-07 issued on August 9, 2007 in the City of Milton, Ontario, Canada) had also filed a Proof of Claim form on November 10, 2009 and provided a copy of the Statement of Claim.

Dated: London, Ontario, Canada  
April 29, 2011

FOSTER, TOWNSEND, GRAHAM  
AND ASSOCIATES  
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Solicitors for the Defendant,  
Arthur Parratt

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AND TO: **Thomas Morrow**  
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AND TO: **Lawrence S. Buonomo, Esq.**  
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AND TO: **John J. Rapisardi, Esq.**  
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AND TO: **John Samarias, Esq.**  
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AND TO: **Michael J. Edelman &**  
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AND TO: **Tracy Hope Davis, Esq.**  
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AND TO: **Anna Phillips**  
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**Foster Townsend  
Graham & Associates**  
LLP  
ATTORNEYS

May 2, 2011

File No.: 127/05775/JAB

**VIA COURIER**

United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004-1406

Dear Sirs:

**Re: Motors Liquidation Company, et. al.  
f/k/a General Motors Corp., et. al.  
Chapter 11, Case No. 09-50026**

We would ask that you please file the attached Response to Objection to Claim at your earliest opportunity. All parties of interest have been served with a copy by ordinary mail.

Yours truly,

  
Jacqueline A. Bunt  
Electronic Signature

/emt  
Enclosure – CD

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